3. ORGANIZE TO IMPLEMENT

The Basics

Part of **IMPLEMENTING**
Common Core
State Standards and **Assessments**

A Workbook for State and District Leaders

To download the full workbook, go to
www.parcconline.org/CommonCoreImplementationWorkbook

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IN THIS SECTION

3. Organize To Implement:
The Basics

Diagnostic questions to guide your team's reading of this chapter:

- Is the system's aspiration for students clear and widely shared?

- Has your state conducted a thorough analysis of the gap between current state standards and the Common Core State Standards?

- Is there a designated leadership team with the focus, tools and skill set needed to drive implementation?

- Are the budget and implementation timeline clearly articulated and sufficient to achieve the aspiration?

Planning begins with setting an aspiration. Then, several other building blocks position implementation of the Common Core State Standards (CCSS) for success: a talented team to lead the delivery effort with a clear timeline and budget to accomplish the work, an understanding of how drastic the changes from current to future content standards will be, and a clear communications strategy to engage external support.

Set the Aspiration

The aspiration is a powerful tool that signifies a shared understanding of what success looks like. It must be clear, measurable and understandable to everyone. In the case of the CCSS, the aspiration will describe the impact you expect the new content standards and related assessments to have on student learning by 2014–15. At first glance, this question may seem relatively easy to answer; however, once your leadership team begins to unpack the key components, you may realize that properly answering the question is actually quite complex. *You can learn more about setting an aspiration here.* The aspiration may also identify the theory of action that undergirds your state's reform agenda.

CASE STORY: DELAWARE

Though Delaware student performance has long been above average, leaders in the First State are no longer satisfied. Now, these leaders publicly assert a new aspiration for Delaware: "Every single student in our system will graduate college and career ready, with the freedom to choose his or her life's course. Our education system needs to change because the world is changing, and because it's the right thing to do. We must prepare our students to meet new standards, or we limit their life choices. Our new standards reflect how prepared our students really are. Half of our student population (representing tens of thousands of students) will likely not meet the new standards. The Delaware Education Plan will improve student readiness through more rigorous standards and assessments, better use of data, more effective teachers and increasing the support to low performing schools."[1]

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3.3

EXERCISE: DEFINE YOUR ASPIRATION

Purpose: To clearly articulate the importance of the CCSS and share this aspiration with key stakeholders throughout your state.

Who should participate? The system leader or district superintendent should complete this exercise, with the input of the broader leadership team.

Directions: For each of the areas of CCSS implementation below:

1. Begin with the expectations for students: What are the relevant performance targets for 2014–15? Explain the rationale behind those targets.

2. Describe the current state for each implementation action. What is working well? Where is more planning needed?

3. For each action, describe the ideal state in 2014–15.

4. For each action, explain why it is important that your state make the proposed changes.

		Where are we now?	Where do we want to be in 2014–15?	Rationale
Student performance				
Implementation actions	• Curricula and instructional materials			
	• Professional development			
	• Assessment and accountability			
	• Teacher preparation, evaluation and licensing			
	• Student transitions to higher education			

Form an Internal Leadership Team To Determine Timeline, Assign Responsibility and Monitor Progress

Ownership of the policy elements related to the CCSS sit in many different places within the state education agency; this poses a major challenge for the implementation effort. Thus, states should put together a team tasked with creating an overall vision, timeline, phase-in strategy and work plan for implementation. This **strategic implementation team** will reinforce the delivery message by engaging stakeholders, providing timely updates on the work to partners, and establishing and monitoring key feedback loops.
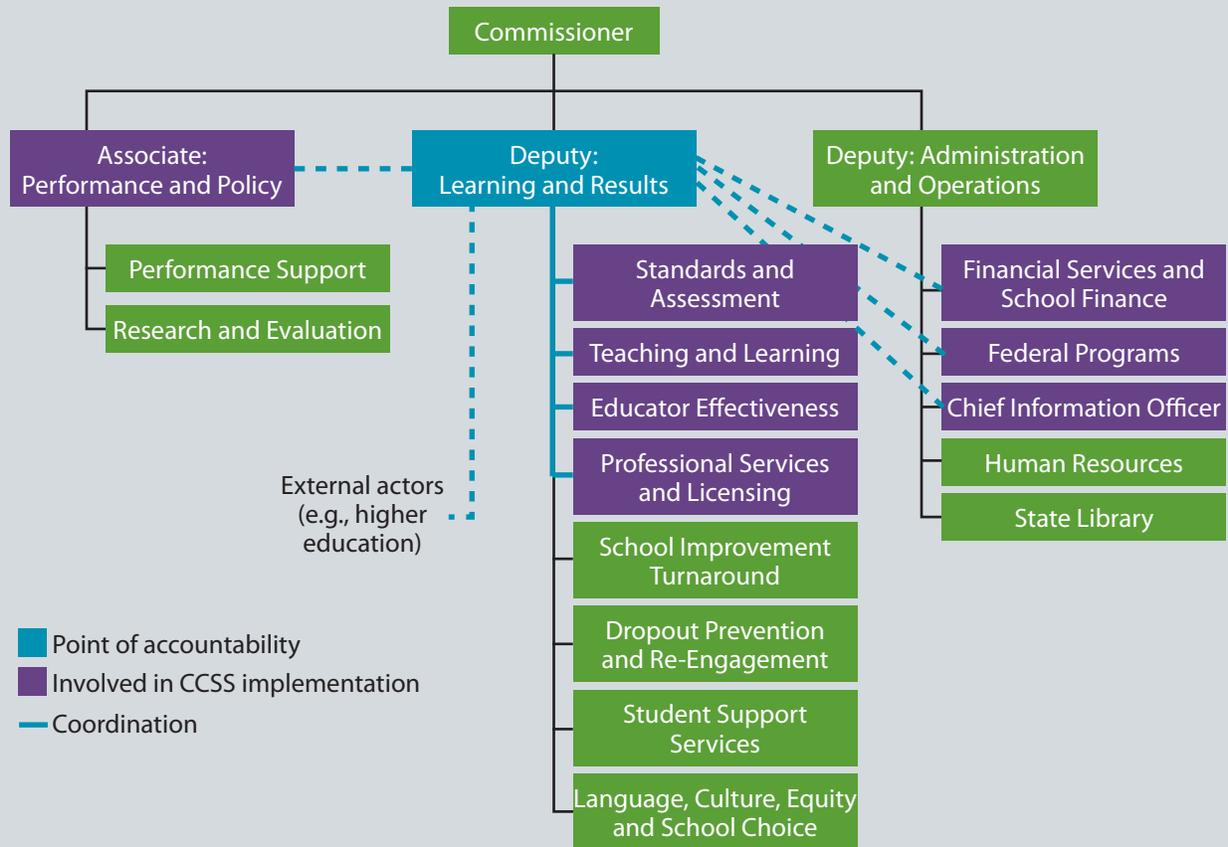
The strategic implementation team must know your current state standards well, have the capacity to consider and make recommendations about each of the elements that should be in the state's plan, and ultimately execute and oversee such a plan. The team should include representatives from the state department of education (curriculum and instruction, assessment, data, district support, special education, English language learners), higher education and the governor's office. Key, too, are policy, budget and communications experts. The team should also include representation from vital districts and schools, including teachers, administrators and content area experts.

As the implementation effort proceeds, your strategic implementation team will likely need to create other working teams to delve into specific issues, such as professional development design, and recommend how to proceed. Consider what mechanism is in place to ensure fluid communication among the department of education, governor's office and other state education entities such as your higher education system or your teacher licensing board. Consider also what mechanism can be used to provide project oversight to the agency's leadership team (e.g., the chief and key deputies).

There are two general models that you can follow to have a single point of accountability:

1. **Assign a deputy or associate commissioner** to drive the overall effort. This person will be held accountable for the deliverables and outcomes expected of the overall effort. He or she must be senior enough to be able to manage and coordinate the heads of the various units that will be involved. The advantage of this approach is coherence, giving both the system leader and those working on the effort somewhere to turn for leadership. Systems that choose this route must find a way to give this leader sufficient leverage to coordinate multiple units within the state education agency — even when the leader does not have direct line authority over them.
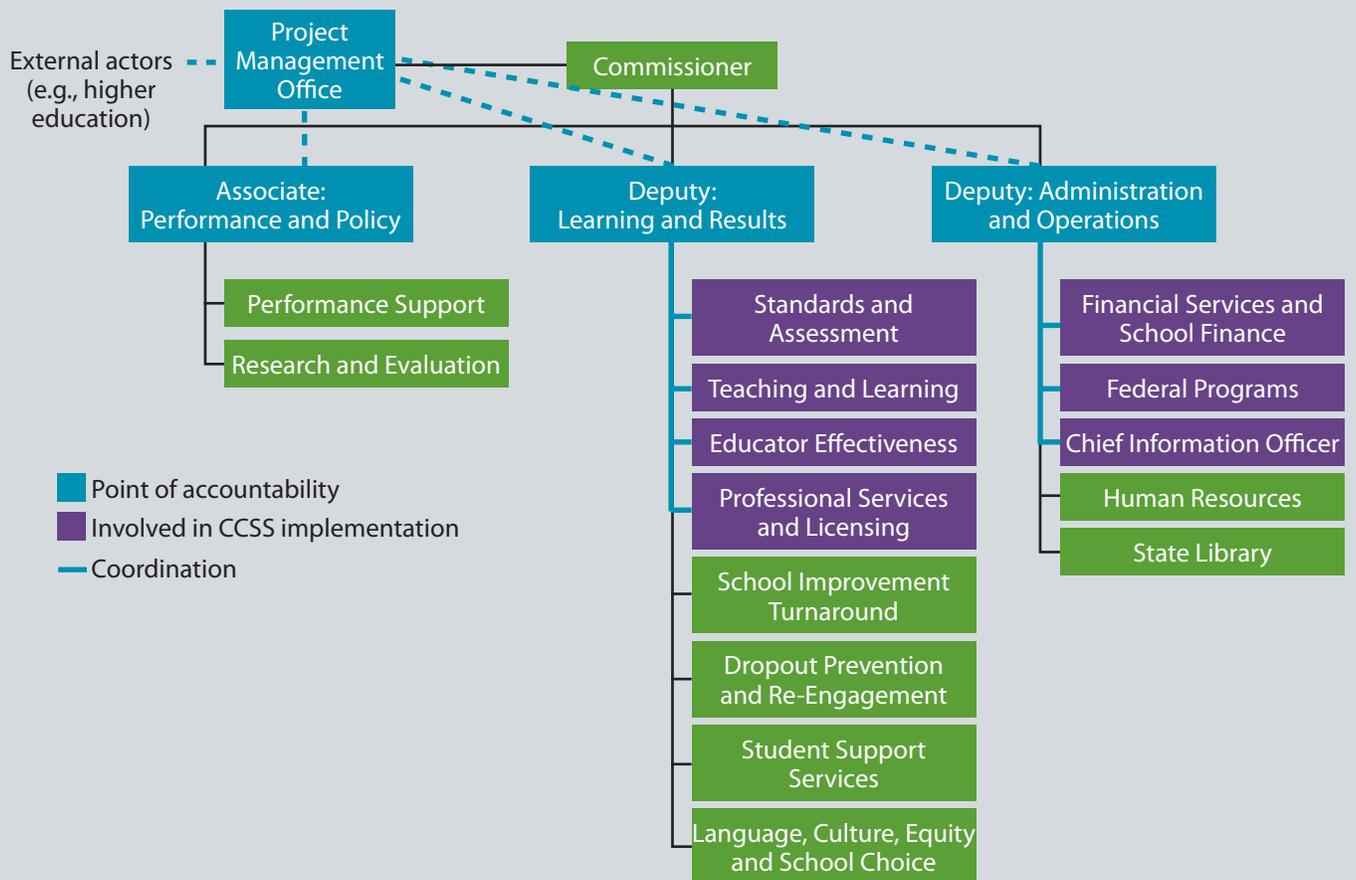
Deputy Commissioner (EXAMPLE)

3.6

Commissioner

Associate:
Performance and Policy

Deputy:
Learning and Results

Deputy: Administration
and Operations

Performance Support

Research and Evaluation

Standards and
Assessment

Teaching and Learning

Educator Effectiveness

Professional Services
and Licensing

School Improvement
Turnaround

Dropout Prevention
and Re-Engagement

Student Support
Services

Language, Culture, Equity
and School Choice

Financial Services and
School Finance

Federal Programs

Chief Information Officer

Human Resources

State Library

External actors
(e.g., higher
education)

■ Point of accountability
■ Involved in CCSS implementation
— Coordination

2. **Create a project management office (PMO).** Designate a person or team of people with the right skills to drive implementation by applying the right set of tools for planning and problem-solving. In this case, direct leadership of project work will sit in the various units in the agency; the PMO will play a coordinating and monitoring role. Systems that already have PMOs could potentially fold this work into their existing efforts. PMO staff members need not be senior, but they must be skilled at working with and coordinating more senior counterparts. Thus, they will need strong problem-solving skills, interpersonal and relationship management skills, and "run room" from the senior team to coordinate the work. This approach is less disruptive to existing lines of hierarchy in the organization. To make the approach work, system leaders need to be able to rely on a strong leadership team that can work well together and will be willing to respect the role that the PMO plays. They will also need to find the right person to lead the PMO.

Systems that already have *delivery units* may adopt either approach and integrate it with their existing delivery efforts. In the case of a single point of accountability, that person will become the delivery unit's primary point of contact. In the case of a PMO, the delivery unit will play a parallel role, managing toward overall outcomes even as the PMO is tracking deliverables and milestones. **You can learn more about the role of a delivery unit <u>here</u>.**
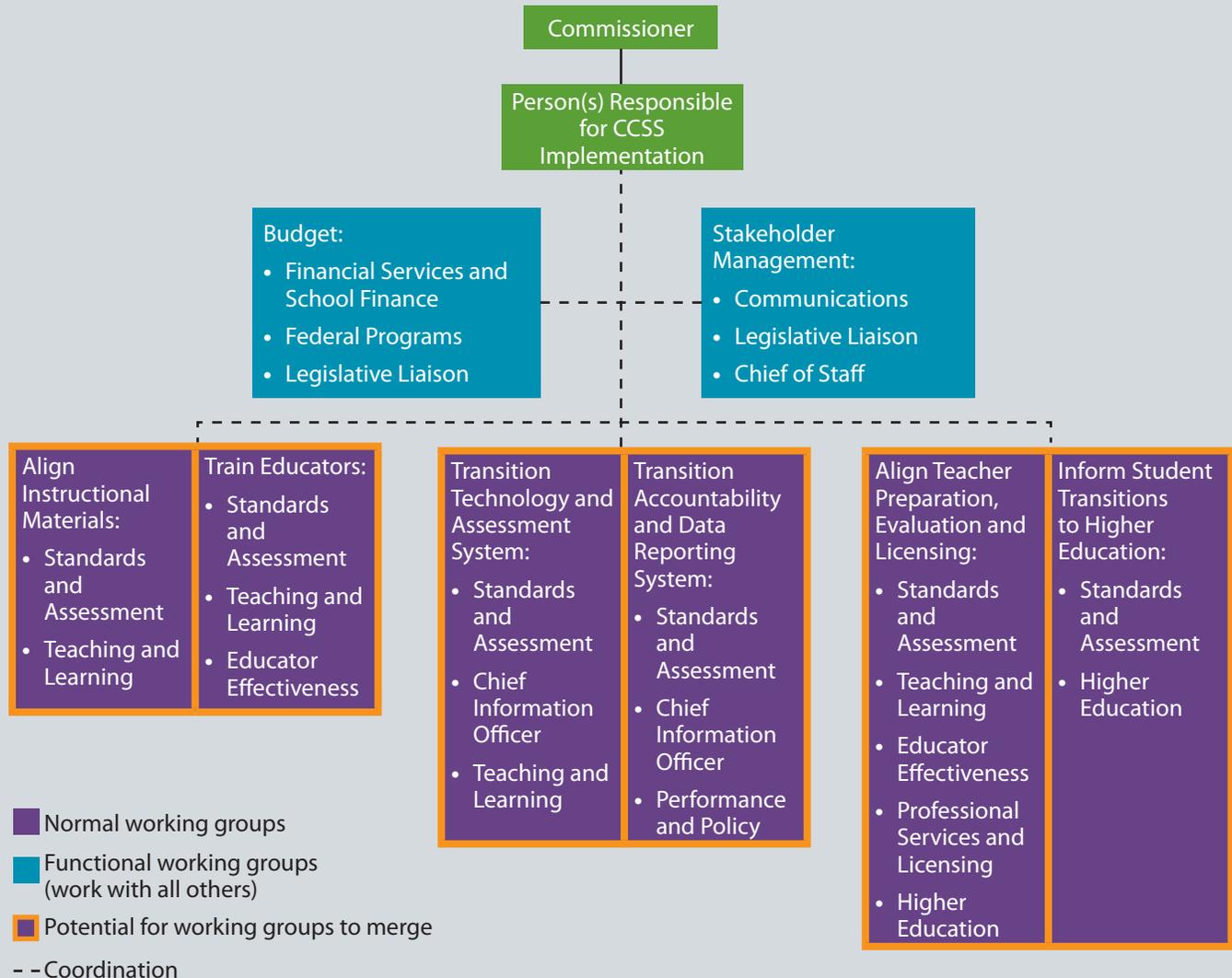
Project Management Office (EXAMPLE)

3.7

External actors (e.g., higher education)

- Project Management Office
- Commissioner

Associate: Performance and Policy
- Performance Support
- Research and Evaluation

Deputy: Learning and Results
- Standards and Assessment
- Teaching and Learning
- Educator Effectiveness
- Professional Services and Licensing
- School Improvement Turnaround
- Dropout Prevention and Re-Engagement
- Student Support Services
- Language, Culture, Equity and School Choice

Deputy: Administration and Operations
- Financial Services and School Finance
- Federal Programs
- Chief Information Officer
- Human Resources
- State Library

Legend:
- ■ Point of accountability
- ■ Involved in CCSS implementation
- — Coordination

Even with leadership defined, staff members throughout the system will need to coordinate their efforts in a way that gets beyond the department's organization chart. To break down silos, it is advisable to create some type of working group structure that brings the relevant leaders together around the major areas of work. Different tasks will require the various divisions in your agency to combine their efforts — often with the efforts of external partners like higher education institutions — in different ways. For example, a working group around the transition of a technology and assessment system might include representatives from standards and assessment, the chief information officer, the teaching and learning division of a state education agency, and district and vendor partners. And any working group will need to draw on your agency's budget, finance and communications divisions to ensure that it is using resources and managing stakeholders effectively.

Whatever form your strategic implementation team takes, it will interact primarily with these working groups. An example of a working group structure is given in the figure on the next page.

Working Group Structure (EXAMPLE)

3.8

Commissioner

Person(s) Responsible for CCSS Implementation

Budget:
- Financial Services and School Finance
- Federal Programs
- Legislative Liaison

Stakeholder Management:
- Communications
- Legislative Liaison
- Chief of Staff

Align Instructional Materials:
- Standards and Assessment
- Teaching and Learning

Train Educators:
- Standards and Assessment
- Teaching and Learning
- Educator Effectiveness

Transition Technology and Assessment System:
- Standards and Assessment
- Chief Information Officer
- Teaching and Learning

Transition Accountability and Data Reporting System:
- Standards and Assessment
- Chief Information Officer
- Performance and Policy

Align Teacher Preparation, Evaluation and Licensing:
- Standards and Assessment
- Teaching and Learning
- Educator Effectiveness
- Professional Services and Licensing
- Higher Education

Inform Student Transitions to Higher Education:
- Standards and Assessment
- Higher Education

- Normal working groups
- Functional working groups (work with all others)
- Potential for working groups to merge
- - Coordination

CASE STORY: KENTUCKY

The Kentucky Board of Education, the Council on Postsecondary Education and the Education Professional Standards Board signed a resolution directing their respective agencies to implement the CCSS in English language arts and mathematics. This resolution formalizes the state's agreement to integrate standards into its K–12 curriculum, teacher preparation programs and other higher education activities. Details on the resolution can be found _here_.

Set Assessment Implementation Timeline

Budget and timeline considerations influence how your state rolls out the transition to the CCSS. The implementation timeline can be staggered by year, content area, pilot districts or cohort (e.g., bringing the CCSS first to the youngest grade in elementary, middle and high schools).

To help you navigate amongst these choices, a **sample** timeline is provided for how to move toward the CCSS. Each state and district will obviously need to customize the implementation effort. For example, a state or district may develop a plan based on the results of its gap analysis and grab the "low-hanging fruit" in grades in which the CCSS are most similar to the state's former standards. The sample timeline simply provides an important reference point as you set your own timeline for this effort.

Though the timeline is fictitious, it is designed to inform your thinking around timing interdependencies across various streams of work, the flow of information and feedback to monitor progress, and the capacity lift that will be required to implement new standards and assessments. Leaders from across the state education agency may well be implicated in this endeavor, which touches many different areas of work; engaging in this process will help identify where those connections exist to strengthen communication and collaboration among leaders and managers responsible for moving the work forward on a daily basis. It will also highlight opportunities to improve efficiencies across the agency; increase the coherence of the effort; and wherever possible, break down silos between agencies responsible for carrying out the various streams of work.

The following assumptions were made in constructing the timelines:

- **The state has conducted a valid and reliable comparison between its former K–12 standards in English language arts and math and the new CCSS.** Additionally, it is assumed that the state has identified the gaps between the two sets of standards, new content and performance expectations, and changes in grade-level content and noted what content is no longer included.

- **State and district roles overlap, ownership of components is shared, and horizontal and vertical collaborations will occur.** States will employ different approaches in how/who leads particular components/stages of the work and when districts assume more responsibility. States should identify high-capacity districts capable of piloting efforts in front of statewide implementation.

- Though **implementation may be staggered by grade/grade band depending on state/district needs and capacity,** the following timeline was used for purposes of this exercise:

  — MeasuredState: CCSS K–2 (2011–12); CCSS 3–5 (2012–13); CCSS 6–8 (2013–14); and CCSS 9–12 (2014–15); all transition support (professional development, assessment rollout, etc.) occurs for all grades simultaneously.

- **The state has established state-, regional-, district-, school- and classroom-level processes** around adoption and implementation of new curricula and instructional materials. The same assumption holds for professional development.

- English language arts and math content areas **follow the same implementation timeline.**

- Adjustments to the accountability/reporting timeline will be made **contingent upon reauthorization of the Elementary and Secondary Education Act or approved waiver request.**

- **Critical anchor milestones have been identified in ORANGE** and can be used by the chief, deputy or other senior leader to manage the overall flow of work.

MeasuredState: 2014 Implementation Timeline for CCSS/PARCC (EXAMPLE)

	Spring 2011	Summer 2011	Fall 2011	Winter 2011	Spring 2012	Summer 2012	Fall 2012	Winter 2012	Spring 2013	Summer 2013	Fall 2013	Winter 2013	Spring 2014	Summer 2014	Fall 2014
Organize to implement															
Conduct gap analysis on new vs. existing standards *(assumed done already)*															
Form an internal leadership team (the strategic implementation team) to determine timeline, assign responsibility and establish process to monitor progress	▓														
Set instructional/assessment implementation timeline	▓														
Conduct self-assessment/audit of resource allocation	▓														
Set budget	▓														
Build a base of support by establishing the "guiding coalition": Develop a list of the partners most important to making teachers aware of the new CCSS	▓	▓													
Build a base of support by establishing the guiding coalition: Identify new/existing channels to leverage for curriculum, professional development and communications needs	▓	▓													
Identify critical audiences and key messages in communications plan				▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓
Create messages/materials/social media/events tailored to different audiences with a focus on classroom teachers				▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓
Create a plan and timeline for executing communications strategies and seeking stakeholder input and feedback, including surveys, sample audits, focus groups, listening tours by state leaders				▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓
Communicate the delivery message and widen the circles of leadership: Disseminate materials/information (state board of education, governor, state legislature, higher education, education organizations, professional development network leaders, district curriculum leaders, career technical centers, teachers, regional/district leadership teams and charter schools)	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓
Communicate the delivery message and widen the circles of the leadership: Develop/refine stakeholder engagement strategy around the CCSS and related assessment implementation	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓
Align curricular and instructional materials (may be **state-led, district-led** or a **hybrid,** whereby the state leverages high-capacity districts' efforts in front of statewide implementation)															
Make publicly available the results of a secondary review/validation of standards gap analysis, including the differences in topic, content AND cognitive demand	▓														
Develop a process for review of textbook and instructional materials	▓	▓													
Compare alignment of existing state-developed instructional materials/performance tasks to the CCSS		▓	▓	▓	▓										

■ Critical milestone

	Spring 2011	Summer 2011	Fall 2011	Winter 2011	Spring 2012	Summer 2012	Fall 2012	Winter 2012	Spring 2013	Summer 2013	Fall 2013	Winter 2013	Spring 2014	Summer 2014	Fall 2014
Develop model aligned instructional materials (e.g., frameworks, units, performance tasks) coordinating/building on PARCC Model Content Frameworks and PARCC prototypes			■	■	■	■									
Convene group of stakeholders (e.g., educators, higher education, state education agency staff) to provide feedback on PARCC Model Content Frameworks to inform summer 2012 refinements					■										
Review state/district textbook and instructional materials procurement policies and ensure adoption timeline necessitates that materials align with CCSS implementation timeline			■	■	■	■	■	■	■	■	■				
Examine course specifications — particularly at the high school level — to ensure they align with the new CCSS	■	■													
Examine state graduation requirements policies in collaboration with higher education and technical college staff to ensure alignment with the new CCSS; it takes, on average, five to six years for changes in state graduation requirements to take effect. This might begin with an inventory of district requirements.				■											
Review/implement PARCC model 12th grade bridge courses aligned to the CCSS										■	■	■	■		
Develop a plan for integrating the CCSS literacy standards into the state science and social studies standards (crosswalk literacy standards with state science/social studies standards, identify next revision cycle, etc.)		■	■	■	■	■	■	■	■	■	■	■	■	■	■
Teach the CCSS in the classroom			K–2			3–5					6–8				9–12
Identify metrics for success and establish feedback loops to monitor whether instructional practice changes				■	■	■	■	■	■	■	■	■	■	■	■
Establish routines to track progress of the quality and use of classroom materials					■	■	■	■	■	■	■	■	■	■	■
Train educators and school leaders (may be **state-led, district-led** or a **hybrid,** whereby the state leverages high-capacity districts' efforts in front of statewide implementation) Note: These include time-release to attend professional development and time to share/reflect in teams back in the building.															
Develop a coordinated agencywide plan and calendar for professional development (PD)	■	■	■												
Conduct awareness sessions to make teachers/principals comfortable with the CCSS	■	■													
Models and exemplars of quality, aligned PD are defined, required, provided or certified for teachers and principals				■	■	■	■	■	■	■	■				
PD to unpack standards to ensure deep understanding of content and performance expectations		■	■	■	■	■	■								
PD for teachers with new/different content responsibilities				■	■	■	■	■	■	■					
PD for teachers on instructional strategies				■	■	■	■	■	■	■	■	■	■	■	■
PD for principals focused on instructional leadership				■	■	■	■	■	■	■	■				

	Spring 2011	Summer 2011	Fall 2011	Winter 2011	Spring 2012	Summer 2012	Fall 2012	Winter 2012	Spring 2013	Summer 2013	Fall 2013	Winter 2013	Spring 2014	Summer 2014	Fall 2014
PD on use of observation rubrics in teacher evaluation and other formative teacher assessment tools to inform ongoing professional coaching of teachers				■	■	■	■	■	■	■	■				
PD for teachers on PARCC assessment system, item types and data interpretation						■	■	■	■	■	■				
PD for regional/district and school staff to use online assessments and development/support for technology-enabled tools that help building-level staff assess specific gaps in student mastery of the CCSS (e.g., data dashboards)				■	■	■	■	■	■	■	■	■			
PD for teachers on literacy standards in science, social studies and technology						■	■	■	■	■	■				
PD for regional/district and school staff on using rubrics to ascertain quality of curriculum and instructional tools						■	■	■	■	■	■	■	■	■	
Select PARCC Educator Leader Cadre participants and integrate into larger PD plan						■	■								
If Race to the Top awardee, crosswalk and coordinate local education agency scopes of work with state PD plans						■	■	■	■	■	■	■	■	■	■
Transition assessment system															
Develop an assessment transition plan	■	■	■	■	■	■									
Conduct an analysis of the current state assessment blueprint/test specifications against the new CCSS to identify changes in topic placement and cognitive demand and to determine the significance of changes required to accommodate the new standards (including alternative assessments)	■	■													
Align formative tools/assessments to CCSS content to avoid measuring outdated content or expectations	■	■													
Create, disseminate and collect formative assessment mapping tools for district- and school-level inventory					■	■	■	■	■	■					
Determine state/district/school role in vetting formative assessment tools					■	■	■	■	■	■					
Review existing items for alignment with regard to grade level and cognitive demand		■	■												
Convene Technical Advisory Committee to present findings and determine if a transition test is plausible and appropriate. If appropriate, offer assessment guidance to signal changes on state assessment between now and 2014.		■	■	■	■										
Develop a notification strategy to alert all districts, schools and communities about: • Year of implementation (notification should occur at least 12 months prior to the operational assessment) • Changes to the assessment structure If possible, release items indicative of the new assessment				■	■	■									

	Spring 2011	Summer 2011	Fall 2011	Winter 2011	Spring 2012	Summer 2012	Fall 2012	Winter 2012	Spring 2013	Summer 2013	Fall 2013	Winter 2013	Spring 2014	Summer 2014	Fall 2014
The following assessment transition tasks may not be applicable and are dependent upon a state's decision to change its current state assessments in English language arts and math prior to the implementation of the common assessments.															
Review the possible new assessment to ensure all federal regulations regarding peer review and approval are appropriate or if new approval will be needed															
Review current assessment contracts and overall fiscal resources to determine the fiscal and practical impact, especially if additional field testing or new standard setting is required															
Ensure internal leadership fully understands the implications of changes in assessment															
Convene a team of district assessment directors to discuss district and school impact of a change in the assessment at this stage															
Determine state policy around PARCC-developed optional diagnostic and mid-year assessments and communicate to districts and schools										X	X	X			
Pilot participation in PARCC													X		
Fully participate in PARCC statewide															X
Transition technology to support accountability and reporting system															
Develop/refine data governance structure to ensure the necessary flow of data	X	X	X												
Review/revise state/district/higher education data system budgets to prioritize funding the maintenance and growth of a sustainable P–20 data system			X	X	X	X	X	X	X	X	X	X	X	X	
Build/revise user-friendly data dashboards that allow good public reporting of critical college and career readiness indicators							X	X	X	X	X				
Build/revise high school feedback reports to reflect PARCC/college and career readiness indicators							X	X	X	X	X	X	X		
Build/revise state instructional management systems to encourage sharing of classroom materials and best practices					X	X	X								
Identify teacher/school evaluation metrics (growth measures, observations, etc.)										X	X				
Review/revise state accountability system, including any state formula or index, to reflect approaching, meeting and exceeding college and career readiness indicators and PARCC assessments										X	X	X	X		
Consider implications of CCSS/assessments on current statewide accountability systems						X	X								
Develop process to engage appropriate leaders in considering resetting targets and trajectories in preparation for the transition to new PARCC assessments													X	X	X
As needed, crosswalk Elementary and Secondary Education Act waiver requests/approvals with state and district workplans					X	X	X	X	X	X	X	X	X	X	X

■ Critical milestone

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	Spring 2011	Summer 2011	Fall 2011	Winter 2011	Spring 2012	Summer 2012	Fall 2012	Winter 2012	Spring 2013	Summer 2013	Fall 2013	Winter 2013	Spring 2014	Summer 2014	Fall 2014
Transition technology to support assessment system															
Conduct a self-audit, identifying how/if district, state and higher education data systems interact and the technology infrastructure needs to support transition to PARCC	■	■	■												
Establish a definition of technology readiness for districts and schools	■	■	■	■	■										
Evaluate school technology and infrastructure readiness using PARCC/Smarter Balanced Assessment Consortium Technology Readiness Tool (including bandwidth, hardware and software licenses)					■		■		■		■		■		
Develop/refine data governance structure to ensure the necessary flow of data	■	■	■	■	■	■	■	■	■	■	■	■			
Develop plan to migrate other activities to online platform to prepare for new interface														■	■
Build and implement strategies to close technology infrastructure gaps to prepare for computer-based assessments			■	■	■	■	■	■	■	■	■	■	■	■	■
Develop an early warning system based on the PARCC assessment to identify students in need of additional support to get on track before graduation									■	■	■	■	■		
Align teacher preparation, evaluation and licensing (involve higher education and business stakeholders to ensure alignment of these systems to K–12)															
Investigate implications of the CCSS on current teacher licensure/relicensure policies	■	■													
Integrate teacher evaluation into preservice training for teachers and principals	■	■	■	■	■	■	■	■	■	■					
Align teacher and principal observation measures and formative assessment tools with the CCSS					■	■	■	■	■	■	■	■			
Engage higher education faculty (both arts and sciences and teacher educators) to build a full understanding of the new CCSS	■	■	■	■	■	■									
Develop a plan for higher education faculty around in-service teacher training	■	■	■	■	■	■									
Revise teacher in-service and preservice preparation programs and alternative certification programs to align to content/pedagogy of the CCSS	■	■	■	■	■	■									
Inform student transitions to higher education (involve higher education and business stakeholders to ensure alignment of these systems to K–12)															
Align undergraduate entry-level, credit-bearing courses to the CCSS		■	■	■	■	■	■	■	■						
Align/redesign developmental education programs to develop students' knowledge and skills to the level specified in the CCSS					■	■	■	■	■	■	■				
Align developmental courses/modules and undergraduate entry-level, first-year, credit-bearing courses					■	■	■	■	■						
Examine two- and four-year public college and university and college placement requirement policies into entry-level, credit-bearing courses to ensure they align with the new CCSS	■	■	■	■	■	■									

	Spring 2011	Summer 2011	Fall 2011	Winter 2011	Spring 2012	Summer 2012	Fall 2012	Winter 2012	Spring 2013	Summer 2013	Fall 2013	Winter 2013	Spring 2014	Summer 2014	Fall 2014
Monitor and sustain progress (applies to all aspects of implementation above)															
Establish quality control/feedback loop structure to evaluate the impact of transition activities	■														
Identify metrics for success	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■
Monitor progress using one or more internal routines and establish process to prioritize and solve CCSS implementation-related problems	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■
Complete annual review of implementation progress with state policymakers to ensure on track to meet goals		■		■		■		■		■		■		■	

Set the Budget

The goal of the CCSS is to improve a state's core instructional programs to prepare students to meet increasingly rigorous expectations; as such, implementation efforts should be supported primarily with state and local revenue. Federal education grant funds can provide supplemental support to help states, districts and schools leverage reforms, but each federal funding source has its own rules that govern how the grant may be used. The steps below provide a framework to help states and districts determine whether federal funds can be used for a particular cost. This list is not exhaustive. Staff should always consult the specific program statutes, regulations and guidance to determine what additional rules apply. Including the chief financial officers and experts in Title I or other federal programs in all planning discussions for CCSS implementation is an important first step.

Step 1: Identify the specific costs that need to be supported.

The first step in developing a budget is to determine what specific activities, services, supplies, materials and personnel costs need to be funded to implement the CCSS and related assessments. Using federal funds to support some activities may be possible, but evaluating whether federal funds can support a state's or district's implementation efforts is impossible without first identifying the specific costs the state or district wants to fund.

For example, states and districts may wish to provide training about the CCSS and related assessments to instructional staff. Several federal funding sources support professional development, but each grant has its own restrictions for what kinds of professional development activities are permissible.

Note: The Partnership for Assessment of Readiness for College and Careers (PARCC) will bear many of the development costs associated with updating the state testing system on a discrete, one-time-only basis.

Step 2: Make an initial determination of which federal funding sources might be able to support the proposed cost.

The next step is to determine which federal funding sources might be available to support the identified cost. Federal education funding streams are designed for specific purposes and can support only certain types of activities (a brief summary of the major federal funding streams can be found on the following pages). Once the most relevant potential federal funding sources are identified, Steps 3–7 can assist states and districts in further analyzing whether a specific cost is permissible.

For example, a district seeking to launch professional development for teachers in how to use the CCSS and related assessments to improve student achievement in Title I schools identified for improvement, corrective action or restructuring would typically focus on the School Improvement Grant, Title I and Title II. Unless the professional development specifically targets students with disabilities or English language learners, drawing funds from Individuals with Disabilities Education Act (IDEA) grants or Title III is not prudent or legal.

Step 3: Determine whether there are any fiscal restrictions, such as the "supplement not supplant" requirement, that bar the proposed cost.

Most federal education programs have fiscal requirements designed to ensure federal funds are spent on *extra* costs a state or district would not normally support with state or local funds. The most common of these requirements is the supplement not supplant rule. While applying the supplement not supplant test is very fact specific and varies from program to program, in general, costs are *not* considered extra when they:

➤ Are required by state, local or federal law;

➤ Were previously supported with state or local funds; or

➤ Benefit all students, not just the specific target population of a given grant (this is mostly relevant for the Title I and migrant programs).

Given this, identify which of the costs from Step 1 are extra costs the state or district would not normally pay for; these extra costs are typically the ones that may be eligible for federal support. For example, if a state legislature mandates that districts carry out specific types of professional development activities as part of the CCSS implementation effort, districts generally may not support those professional development activities with federal funds that contain a supplement not supplant requirement.

Note: Schools that operate Title I schoolwide programs, explained in more detail **_here_**, may have more flexibility in defining what is considered extra at the school level. As a practical matter, however, there is considerable confusion among auditors and monitors about how to apply the supplement not supplant requirement to costs at the school level; thus, schoolwide program schools must exercise caution when developing their budgets.

Step 4: Determine who will benefit from the cost.

If a proposed cost is generally consistent with the purpose of a federal program (Step 2) and does not violate the supplement not supplant requirement that applies to most federal education programs (Step 3), the next step is to determine who will benefit from the proposed costs, such as who will participate in the planned activities, whose salaries will be paid, who will use the materials purchased, etc. Each federal education grant has its own eligibility criteria defining the target population that can be served. Costs may support only eligible beneficiaries. For example, if a school district purchases supplemental instructional materials aligned to the CCSS with IDEA, Part B funds to provide extra support to students with disabilities, the district must ensure the materials are used *exclusively* for IDEA-eligible students.

Step 5: Consider applicable "use of funds" requirements, including mandatory caps and set-asides.

Next, determine whether the proposed costs are consistent with a program's use of funds requirements. Many federal education programs have a statutory use of funds section that outlines the types of costs that can be charged to the program. Some programs, such as Title I and IDEA, do not have a specific use of funds section, in which case the proposed costs must clearly align to the program's purpose. In addition to the statute and regulations, the U.S. Department of Education develops nonregulatory guidance for certain programs that contains more information about the use of funds.

States and districts should also take into account any statutory caps that limit the amount that may be spent on specific types of costs, as well as set-asides that require funds to be spent on specific activities.

Practical Tip: Many federal education programs require districts (and, in some cases, states) to set aside funds to support activities for eligible private school students, staff and parents. How a district uses federal funds for its public schools can, in some cases, affect what it must set aside for private schools.

In addition to federal use of funds requirements, states and districts must also take into account state-imposed rules that affect federal grant programs. Most of the major federal education programs, such as Title I and IDEA, are state-administered programs, meaning the state is responsible for overseeing program implementation throughout the state. As a result, states are given latitude to impose additional rules governing how federal funds may be spent. Districts are legally required to comply with these state-imposed rules as well.

States that wish to encourage their districts to use federal funds for CCSS implementation activities might consider ways they can support district efforts, such as minimizing state-imposed barriers and developing guidance informing districts how they can use federal funds for specific activities.

Step 6: Identify why the proposed cost is "necessary and reasonable" for the success of the federal program supporting the cost.

Consider how the proposed cost will further the goals and objectives of the federal program(s) that might be used to support the cost. All costs charged to federal funds must, among other things, be necessary for the performance or administration of the relevant federal program(s). They must also be reasonable in light of the amount of money to be spent and the needs of the entity spending the funds.

Practical Tip: States and districts must be able to demonstrate that all costs charged to federal funds benefit the program(s) that support the costs. As states and districts develop their budgets, they should think ahead about the systems they will rely on and the strategies they will use to document their activities.

For example, a state or district using federal funds to support an implementation cost should be prepared to demonstrate how the activity furthers the goals of the applicable federal grant program; that the amount paid reflects a fair market value; and that the state or district followed all applicable state and local laws, policies and procedures when paying for the activity (e.g., procurement rules, inventory rules, payroll and human resources rules).

Step 7: Review state rules, grant applications and program plans.

The last step is to ensure the proposed cost is consistent with any application, program plan or other planning tool the state, district or school submitted to receive the funds. All costs charged to federal funds must be consistent with these plans. States typically submit plans and applications to the U.S. Department of Education. For example, states submitted a document known as the "Consolidated Application" for major Elementary and Secondary Education Act programs in 2002, along with additional information, including accountability workbooks, in subsequent years as part of that process. Similarly, states were required to submit a detailed application for School Improvement Grant funds under section 1003(g) and for Race to the Top funds.

In state-administered programs, districts submit plans and applications to their state, and the state is responsible for designing the applications that districts use to apply for funds. Depending on the timing and the application process involved, states or districts might need to amend their applications to use federal funds if the cost is not contemplated by the initial application.

Overview of Major Federal Education Programs

The following summaries provide a brief overview of certain federal education programs that may be relevant to CCSS implementation efforts. A state, district or school must take a range of issues into account before using any of these funding sources for a particular cost. These overviews are designed only to help identify potential sources of funding for proposed activities. Because federal funds often have different requirements for how funds can be used at the state, district and, in some cases, school levels, these summaries provide brief information about the permissible uses of funds at each level.

Title I, School Improvement, Section 1003(a)

Purpose: To improve student achievement in Title I schools identified for improvement, corrective action or restructuring to enable those schools to make adequate yearly progress and exit improvement status.

Major uses of funds include salaries, professional development, materials and other costs related to school improvement initiatives.

State	State education agencies (SEAs) must reserve 4 percent of their Title I, Part A allocation for school improvement activities. Of this amount, they may retain 5 percent to carry out their responsibilities for school improvement under **section 1116** and the statewide system of support under **section 1117**.
District	Local education agencies (LEAs) may use their funds for school improvement activities consistent with **section 1116** in schools identified for improvement, corrective action or restructuring.
School	LEAs are not required to allocate funds to schools but may choose to in order to support school-level school improvement activities.

Section 1003(a) funds are not technically governed by a supplement not supplant provision; however, other rules require Title I funds — including section 1003(a) funds — be used for extra costs. *See Q&A F-4 of the U.S. Department of Education's Non-Regulatory Guidance on School Improvement Grants.*

Title I, School Improvement Grant, Section 1003(g)

Purpose: In conjunction with funds reserved under section 1003(a), to improve student achievement in Title I schools and Title I-eligible schools identified for improvement, corrective action or restructuring to enable those schools to make adequate yearly progress and exit improvement status.

Major uses of funds include costs related to implementing the school turnaround initiatives described in the state and local applications, consistent with the approved budgets.

State	SEAs may reserve up to 5 percent of the grant for administration, evaluation and technical assistance expenses.
District	LEAs must use funds to implement one of four school intervention models in eligible schools in accordance with the LEA's application approved by the SEA.
School	Funds earmarked for school-level costs must be spent consistently to implement the selected school intervention model in accordance with the LEA's application approved by the SEA.

Please note, section 1003(g) funds are not technically governed by a supplement not supplant provision; however, other rules require Title I funds — including section 1003(g) funds — be used for extra costs. _**See Q&A F-4 of the U.S. Department of Education's Non-Regulatory Guidance on School Improvement Grants.**_

Title I, Part A

Purpose: To ensure that all children have a fair, equal and significant opportunity to obtain high-quality education and reach, at a minimum, proficiency on challenging state academic achievement standards and state academic assessments.

Title I, Part A does not have a specific use of funds section describing the allowable use of Title I, Part A funds. However, Title I does have a _**statement of purpose**_. Because Part A falls under Title I, funds spent on Part A programs must adhere to the purposes of Title I. Major uses of funds include salaries, professional development activities for Title I staff, instructional materials and supplies, and activities designed to help improve student academic achievement.

State	SEAs may reserve up to 1 percent of the Title I, Part A grant for state administration. As a practical matter, most states require the full amount of this set-aside for implementing the oversight responsibilities of the Title I program.
District	LEAs may, and in some cases must, reserve funds for **specific district-level activities.** In particular, LEAs may reserve funds for districtwide initiatives that benefit eligible students and are consistent with the purposes of Title I.
School	Schools that receive Title I must operate one of two program models. • A school that is eligible to operate a **schoolwide program** may spend funds on educational costs consistent with the school's needs identified through a needs assessment and articulated in a schoolwide plan. • Schools that are not eligible to operate a schoolwide program, or that choose not to, must operate a targeted assistance program. Such schools must use Title I funds to target specifically identified students.

Title I, Part A contains a _**supplement not supplant**_ provision; at the school level, a different test applies to schools with schoolwide programs, which may provide for more flexibility in certain circumstances. For more information about this rule, please see the _**U.S. Department of Education's Non-Regulatory Guidance on Title I Fiscal Issues.**_

Title II, Part A (Improving Teacher Quality)

Purpose: To increase student academic achievement through strategies such as improving teacher and principal quality and increasing the number of highly qualified teachers in the classroom and highly qualified principals and assistant principals in schools and to hold LEAs and schools accountable for improvements in student academic achievement.

Major uses of funds include professional development activities, activities to recruit and retain highly qualified teachers, and class size reduction.

State	SEAs may reserve up to 2.5 percent of the Title II, Part A allocation for a variety of state-level activities set out in **section 2113(c),** including professional development for teachers and principals in the state, helping LEAs create professional development programs, and supporting activities to ensure that teachers use state standards and assessments to improve instructional practices and academic achievement. Please note: State-level Title II, Part A funds are subject to **equitable services** requirements for private schools. As a result, each SEA must use a portion of the funds it reserves for state-level activities to provide equitable services to private school teachers, principals and other staff.
District	LEAs must conduct a needs assessment to determine the needs of the LEA's teaching force to be able to have all students meet state standards. The LEA must spend Title II, Part A funds, consistent with the results of the needs assessment, on activities set out in **section 2123,** including certain kinds of professional development activities to improve instructional practices and academic achievement.
School	LEAs are not required to allocate Title II, Part A funds to schools. If an LEA chooses to, the school must spend the funds consistent with section 2113, unless the allocation is used to support a schoolwide program, in which case the funds must be used consistent with the schoolwide plan.

Title II, Part A contains a supplement not supplant provision at both the **_state_** and **_local_** levels.

Title II, Part B (Math and Science Partnerships)

Purpose: To improve the academic achievement of students in the areas of mathematics and science.

Major uses of funds include professional development for math and science teachers, instruction on the use of data and assessments to improve classroom practices, and developing more rigorous math and science curricula, consistent with the partnership's approved application and budget.

State	SEAs may reserve a limited amount of funds that are necessary and reasonable for administering the Math and Science Partnership program.
Partnership*	Partnerships may spend funds consistent with their approved application on authorized activities in **section 2202.** If set out in the approved application or an appropriate amendment, these activities may include developing or redesigning more rigorous mathematics and science curricula as well as professional development activities for math and science teachers.

*States must fund eligible partnerships made up of a high-needs LEA and an engineering, mathematics or science department of an institution of higher education. The partnership may include other organizations identified by **_statute_**.

Title II, Part B contains a **_supplement not supplant_** provision.

Title III, Part A (English Language Acquisition)

Purpose: To help ensure that children who are limited English proficient, including immigrant children and youth, attain English proficiency, develop high levels of academic attainment in English and meet the same state standards all children are expected to meet.

Major uses of funds include professional development for eligible teachers and supplemental materials for eligible students.

State	SEAs may reserve up to 5 percent of the Title III, Part A allocation for a variety of state-level activities set out in **section 3111**, including professional development activities and other activities that assist personnel in meeting state and local certification and licensing requirements for teaching limited English proficient children. Please note: State-level Title III, Part A funds are subject to **equitable services** requirements for private schools. As a result, each SEA must use a portion of the funds it reserves for state-level activities to provide equitable services to private schools.
District	LEAs must use district-level funds for the mandatory activities set out in **section 3115(c),** including specific kinds of professional development activities to improve language instruction programs. After carrying out the mandatory activities, LEAs may use their funds for the activities set out in **section 3115(d).**
School	LEAs are not required to allocate Title III, Part A funds to schools. If an LEA chooses to, the school must spend the funds consistent with section 2113, unless the allocation is used to support a schoolwide program, in which case the funds must be used consistent with the schoolwide plan.

Title III, Part A contains a **_supplement not supplant_** provision. For more information about this rule, please see the **_U.S. Department of Education's Non-Regulatory Guidance on Supplement Not Supplant Provision of Title III of the ESEA_**.

IDEA, Part B (Special Education Grants)

Purpose: To ensure that all children with disabilities have available to them a free appropriate public education that emphasizes special education and related services designed to meet their unique needs and prepare them for further education, employment and independent living.

Major uses of funds include salaries, professional development activities for special education staff, child find and evaluation activities, supplemental instructional materials and supplies, and permissible assistive technology.

State	Consistent with their state plans, SEAs may spend the funds reserved for state-level activities on a variety of costs set out in **section 611(e).** SEAs must carry out the monitoring, enforcement, complaint investigation and mediation activities specified in section 611(e)(2)(B) and then may carry out other authorized activities, including professional development.
District	IDEA, Part B does not have a specific use of funds section describing the allowable use of district-level funds. Consistent with their local plans, LEAs must spend their IDEA, Part B funds for the excess cost of providing special education and related services to eligible children.
School	LEAs are not required to allocate IDEA, Part B funds to schools. If an LEA chooses to make the allocation, the school must spend the funds consistent with the purpose of Part B, unless the allocation is used to support a schoolwide program, in which case the funds must be used consistent with the schoolwide plan.

IDEA, Part B contains a **_supplement not supplant_** provision, although **_some state-level funds are exempt_**. For more information about this rule, please see **_Q&A C-6 in the U.S. Department of Education's Non-Regulatory Guidance on Funds for Part B of the Individuals with Disabilities Education Act Made Available Under the American Recovery and Reinvestment Act of 2009_**.

Race to the Top

Purpose: To encourage and reward states that are creating the conditions for education innovation and reform; achieving significant improvement in student outcomes, including making substantial gains in student achievement, closing achievement gaps, improving high school graduation rates, and ensuring student preparation for success in college and careers; and implementing ambitious plans in four core education reform areas.

Major uses of funds include educational costs to implement the initiatives articulated in the approved application and budget.

State	SEAs must spend funds reserved for state-level activities consistent with the approved scope of work submitted to the U.S. Department of Education.
District	LEAs must spend funds for district-level activities consistent with the approved scope of work submitted to the state.
School	LEAs may serve schools consistent with the approved scope of work submitted to the state.

Race to the Top does not contain a supplement not supplant provision.

Complete the Gap Analysis

You will want to identify the degree to which your state's current content standards compare with those in the CCSS, as the findings hold obvious implications for curriculum, instruction, assessments and teacher professional development. This activity is best coordinated at the state level and shared with all districts and schools. Most states in PARCC have completed this analysis using Achieve's Common Core Comparison Tool (CCCTool).[2] Those states that have not yet done so can access the CCCTool at *http://ccctool.achieve.org*. The CCCTool provides information — by grade level as well as overall — about what it will take for states to move from their current standards-based systems to full implementation of the CCSS. The CCCTool allows a user first to match one or more state standards to a CCSS and then to rate the strength of the match.

First, though, be sure to closely read the standards themselves. Without doing so, you may miss key, but often subtle, features of the CCSS. For example, a close reading of the mathematics standards will show coherence across grades, coherence within grades, and connections between the content standards and practice standards. The CCSS provide a critical opportunity to help students see mathematics as a connected and interdependent discipline. Now, states and districts are prepared to conduct a gap analysis, the results of which will inform where to funnel resources to support student learning.

While analyzing the gap between current and future standards, be sure to also discuss the changing requirements in cognitive demand. Teachers and curriculum and assessment directors need to not just know about changes in topics within the CCSS but also understand the new requirements for student performance. For instance, 4th grade students have traditionally had to recognize and generate equivalent fractions. In the CCSS, 4th grade students must now use visual fraction models. This task requires a deeper level of understanding and should lead teachers to adapt their instruction and frequently test for understanding via formative assessment. Improve students' preparation for the future rigors required in the CCSS by discussing the actual implications within instruction or assessment using Webb's Depth of Knowledge or Bloom's new verbs. Again, the CCCTool also allows states to determine the cognitive demand rating using a three-point rating system.

Even those states that completed a gap analysis before deciding to adopt the CCSS should consider doing so again. After all, a gap analysis for implementation should show which standards are new, which occur sooner and which

occur later, all of which provide critical data to make decisions on resource allocation, instructional materials and professional development. Reviewing the summary findings from the mathematics and English language arts gap analyses in **_Arizona_**, **_Connecticut_** and **_Oregon_** may also prove instructive. Finally, you should discuss the following questions:

Discussion Questions

➤ Which of the concepts and skills required in the CCSS are included in your state's standards?

➤ How strong is the match between the two sets of standards with regard to topics by grade and the cognitive demand of each topic?

➤ Which of the concepts and skills required in the CCSS are not included in the state's standards?

➤ How similar are the CCSS and state standards with respect to the grade levels at which concepts and skills are taught? At what grade levels do state expectations address concepts and skills earlier or later than the CCSS?

➤ How similar are the CCSS and the state standards with respect to the cognitive demand expectations that are included in specific strands (English language arts) and domains (mathematics)? In what strands and domains are the differences greatest?

➤ Which concepts and skills required in your state's standards are not included in the CCSS?

➤ What are the implications for your curricula, materials and professional development strategy?

CASE STORY: WASHINGTON STATE

Recent legislation in Washington state allows the superintendent of public instruction to provisionally adopt the CCSS. In the legislation, the superintendent was asked to submit a report by January 2011 that compares the new CCSS to the state's current standards, identifies the transition timeline, and estimates the cost to both the state and school districts. Taking the time to analyze this gap has informed the rest of the implementation effort in the state. The full report can be found **_here_**.

Conclusion

The five building blocks covered in this chapter have set the stage for your CCSS implementation effort. With the right aspiration, the appropriate people on board, an adequate budget and a high-level timeline for implementation, you will be well positioned to manage the transition. Even if you are well into implementation, stepping back and ensuring these conditions are in place will aid your effort. Next, you will want to form a communications plan to ensure that others beyond your strategic implementation team support the aims of your CCSS implementation effort.

ENDNOTES

1 Delaware Department of Education (October 2010). *Delaware Education Plan Overview.*

2 The CCCTool is secure: States enter a user name and password provided by Achieve in each content area. Each state can designate specific staff within the department of education as being responsible for distributing the passwords. Once a state receives its passwords, Achieve will no longer distribute them but will refer all inquiries to the designated "password keeper" in the state. For information on how your state can receive a password or to determine your state's password keeper, go to **_www.achieve.org/contact_us_**.

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